

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

Re: ECF No. 1276, 1381, 1418

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO

Debtor.

PROMESA

Title III

No. 17 BK 3283-LTS

**This Notice relates only to the
Commonwealth and shall only be
filed in the lead Case No. 17 BK
3283-LTS**

**NOTICE OF FILING REVISED AGREED ORDER IN ACCORDANCE WITH ORDER
REGARDING JOINT MOTION SEEKING EXTENSION OF DEADLINES IN
CONNECTION WITH COOPERATIVA DE SEGUROS MÚLTIPLES MOTION FOR
CLARIFICATION OF AUTOMATIC STAY AND IN THE ALTERNATIVE RELIEF
FROM THE AUTOMATIC STAY IN THE TITLE III CASE [ECF NO. 1276]**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

PLEASE TAKE NOTICE that on October 6, 2017, the Commonwealth of Puerto Rico (the “Commonwealth”) and Cooperativa de Seguros Múltiples de Puerto Rico (“Movant”) filed the *Joint Urgent Motion Seeking Extension of Deadlines in Connection with Cooperativa de Seguros Múltiples Motion for Clarification of Automatic Stay and in the Alternative Relief From the Automatic Stay in the Title III Case* [ECF No. 1412] (the “Motion”). Attached as Exhibit A to the Motion is the parties’ initial proposed order in connection therewith (the “Initial Proposed Order”).

PLEASE TAKE FURTHER NOTICE that on October 9, 2017, the Court entered the *Order Regarding Joint Motion Seeking Extension of Deadlines in Connection with Cooperativa de Seguros Múltiples Motion for Clarification of Automatic Stay and in the Alternative Relief From the Automatic Stay in the Title III Case* [ECF No. 1418] (the “Scheduling Order”), requiring the parties to submit a revised proposed order that provides the Court at least five business days after the close of briefing to render a decision on these matters.

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit A** is a revised proposed agreed order (the “Revised Proposed Order”), which provides the Court with seven business days after the close of briefing to render a decision on these matters.

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit B** is redline comparing the Revised Proposed Order against the Initial Proposed Order.

PLEASE TAKE FURTHER NOTICE that copies of all documents filed in these title III cases are available (a) free of charge by visiting <https://cases.primeclerk.com/puertorico> or by

calling +1 (844) 822-9231, and (b) on the Court's website at <http://www.prd.uscourts.gov>, subject to the procedures and fees set forth therein.²

PLEASE TAKE FURTHER NOTICE that the parties respectfully request that the Court consider and enter the attached Revised Proposed Order granting the relief requested therein.

Dated: October 12, 2017

Respectfully submitted,

WANDA VÁZQUEZ GARCED
Secretary of Justice

/s/ Wandymar Burgos
WANDYMAR BURGOS VARGAS
USDC 223502
Deputy Secretary in Litigation
Department of Justice
P.O. Box 9020192
San Juan, Puerto Rico 00902-0192
Phone: 787-721-2940 Ext. 2500, 2501
wburgos@justicia.pr.gov

/s/ Héctor E. Valdés
HECTOR E. VALDES ORTIZ
USDC-PR No. 219411
VALDES ORTIZ LAW OFFICES, PA
8461 Lake Worth Rd.
Suite 420
Lake Worth, FL 33467
Tel: (561) 340-1410
hvaldes@v-olaw.com

Attorneys for the Commonwealth of Puerto Rico

Attorneys for Movant Cooperativa de Seguros Múltiples de Puerto Rico

² The Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as the Debtors' representative pursuant to PROMESA section 315(b), has authorized the Department of Justice to file this Notice on behalf of the Commonwealth.

Exhibit A

Revised Proposed Order

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

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Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

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(Jointly Administered)

In re:

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MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO

Debtor.

PROMESA

Title III

No. 17 BK 3283-LTS

**This Order relates only to the
Commonwealth and shall only be
filed in the lead Case No. 17 BK
3283-LTS**

**REVISED AGREED ORDER EXTENDING DEADLINES IN CONNECTION
WITH COOPERATIVA DE SEGUROS MULTIPLES' MOTION FOR
CLARIFICATION OF AUTOMATIC STAY AND IN THE ALTERNATIVE RELIEF
FROM THE AUTOMATIC STAY IN THE TITLE III CASE [ECF NO. 1276]**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Upon the *Joint Urgent Motion Seeking Extension of Deadlines in Connection with Cooperativa De Seguros Múltiples' Motion For Clarification Of Automatic Stay and in the Alternative Relief From the Automatic Stay in the Title III Case [ECF No. 1276]* (the "Motion"),² and the Court having found it has subject matter jurisdiction over this matter pursuant to PROMESA section 306; and it appearing that venue in this district is proper pursuant to PROMESA section 307; and the Court having found that the relief requested in the Motion is in the best interests of the Commonwealth and Movant; and the Court having found that the Commonwealth provided adequate and appropriate notice of the Motion under the circumstances and that no other or further notice is required; and the Court having reviewed the Motion; and the Court having determined that the factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is **HEREBY ORDERED THAT:**

1. The Motion is granted as set forth herein.
2. The Objection Deadline shall be extended to **October 30, 2017 at 12:00 p.m. (prevailing Atlantic Standard Time).**
3. The Reply Deadline shall be extended to **November 6, 2017 at 12:00 p.m. (prevailing Atlantic Standard Time).**
4. Movant is not deemed to have consented to the continuation of the automatic stay in effect pending the conclusion of, or as a result of, a final hearing and determination under Bankruptcy Code section 362(d), nor to have waived its right to assert the termination of the automatic stay under Bankruptcy Code section 362(e) with respect the Stay Relief Motion. The Court shall enter an order regarding the Stay Motion on submission within seven (7) business days

² Capitalized terms used but not otherwise defined herein have the meanings given to them in the Motion.

of the conclusion of briefing or have the matter heard at the November 15, 2017 omnibus hearing, during which time Movant will not assert termination of the Title III Stay under Bankruptcy Code section 362(e).

Dated: _____, 2017

JUDGE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE

Exhibit B

Redline

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

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PROMESA

Title III

No. 17 BK 3283-LTS

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Commonwealth and shall only be
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REVISED AGREED ORDER EXTENDING DEADLINES IN CONNECTION

WITH COOPERATIVA DE SEGUROS MULTIPLES' MOTION FOR

**CLARIFICATION OF AUTOMATIC STAY AND IN THE ALTERNATIVE RELIEF
FROM THE AUTOMATIC STAY IN THE TITLE III CASE [ECF NO. 1276]**

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Upon the *Joint Urgent Motion Seeking Extension of Deadlines in Connection with Cooperativa De Seguros Múltiples' Motion For Clarification Of Automatic Stay and in the Alternative Relief From the Automatic Stay in the Title III Case [ECF No. 1276]* (the "Motion"),² and the Court having found it has subject matter jurisdiction over this matter pursuant to PROMESA section 306; and it appearing that venue in this district is proper pursuant to PROMESA section 307; and the Court having found that the relief requested in the Motion is in the best interests of the Commonwealth and Movant; and the Court having found that the Commonwealth provided adequate and appropriate notice of the Motion under the circumstances and that no other or further notice is required; and the Court having reviewed the Motion; and the Court having determined that the factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is **HEREBY ORDERED THAT:**

1. The Motion is granted as set forth herein.
2. The Objection Deadline shall be extended to ~~November 3,~~October 30, 2017 at **12:00 p.m. (prevailing Atlantic Standard Time).**
3. The Reply Deadline shall be extended to **November ~~10,~~6, 2017 at 12:00 p.m. (prevailing Atlantic Standard Time).**
4. Movant is not deemed to have consented to the continuation of the automatic stay in effect pending the conclusion of, or as a result of, a final hearing and determination under

² Capitalized terms used but not otherwise defined herein have the meanings given to them in the Motion.

Bankruptcy Code section 362(d), nor to have waived its right to assert the termination of the automatic stay under Bankruptcy Code section 362(e) with respect the Stay Relief Motion. The Court shall enter an order regarding the Stay Motion on submission within seven (7) business days of the conclusion of briefing or have the matter heard at the November 15, 2017 omnibus hearing, during which time Movant will not assert termination of the ~~Stay during the pendency of the proposed amended briefing schedule~~ Title III Stay under Bankruptcy Code section 362(e).

Dated: _____, 2017

JUDGE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE